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9 File No.: 125475

10 *Attorneys for Plaintiff*

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13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15  
16 Matthew McDermott,

17 Plaintiff,

18 v.

19 RYI Unity LLC,

20 Defendant.

21 Case No. 8:23-cv-00927-MCS-JDE

22  
23  
24 **PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
DEFAULT JUDGMENT  
PURSUANT TO FED. R. CIV. PRO.  
55(b)(2)**

25 Judge: Hon. Mark C. Scarsi

26 Date: November 13, 2023

27 Time: 9:00 am

28 Location:

Courtroom 7C , 7<sup>th</sup> Floor  
350 W. 1st Street  
Los Angeles, CA. 90012

29 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

30 YOU ARE HEREBY NOTIFIED THAT at 9:00 am on November 13, 2023,  
31 or as soon thereafter as the matter may be heard, before the Honorable Mark C.  
32 Scarsi, of the United States District Court for the Central District of California, in  
33 Courtroom 7C, 350 W. 1st Street, Los Angeles, CA 90012, Plaintiff Matthew  
34 McDermott ("Plaintiff") will and hereby does move this Court for a default judgment

1 against Defendant RYI Unity LLC. Said motion will be made upon the grounds set  
2 forth in the accompanying Memorandum in Support of Plaintiff's Motion for a  
3 default judgment, the Declaration of Jacqueline Mandel dated October 11, 2023, the  
4 Declaration of Matthew McDermott dated October 10, 2023, and the complete files  
5 and records of this action.

6 **CONFERENCE OF COUNSEL**

7 There has been no conference of counsel pursuant to LR 7-3 prior to making  
8 this motion, insofar as Defendant failed to timely appear, the Clerk entered a notation  
9 of Default against Defendant. In other words, there is no adverse party recognized  
10 by the Court with whom a conference could have been conducted.

11 DATED: October 11, 2023

12 **SANDERS LAW GROUP**

13 By: /s/ Jacqueline Mandel  
14 Craig Sanders, Esq. (Cal Bar 284397)  
15 Jacqueline Mandel, Esq. (Cal Bar 317119)  
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File No.: 125475

19 *Attorneys for Plaintiff*



**CERTIFICATE OF SERVICE**

Case Name: Matthew McDermott v. RYI Unity LLC.

Case No.: 8:23-cv-00927-MCS-JDE.

**IT IS HEREBY CERTIFIED THAT:**

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States, and am over 18 years of age. My business address is 333 Earle Ovington Boulevard, Suite 402, Uniondale, New York 11553. I am not a party to this action. I have caused service of the following documents, described as:

**PLAINTIFF'S NOTICE OF MOTION AND MOTION  
FOR DEFAULT JUDGMENT**

on the following parties by USPS mail on October 11, 2023 at:

RYI Unity LLC  
1500 11th St  
Sacramento, CA 95814

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 11, 2023

/s/ Jacqueline Mandel  
Jaqueline Mandel, Esq. (317119)